

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

PENG WANG, QINLIN LI, and YISI
WANG,

Plaintiffs,

v.

KEN PAXTON, Attorney General of Texas,
in his Official Capacity, only.

Defendant.

Case No.

DECLARATION OF JUSTIN SADOWSKY

I, Justin Sadowsky, being of competent mind and over the age of 18, declare as follows:

1. I am a member in good standing of the State Bar of D.C. and Virginia, and I am the Legal Director of the Chinese American Legal Defense Alliance. I am lead counsel for the named Plaintiffs and putative class members in this case. I submit this declaration in support of Plaintiffs' motion for class certification.

2. I am a 2005 graduate of Columbia Law School. After law school, I clerked for the Honorable Daniel M. Friedman, Senior Judge of the U.S. Court of Appeals for the Federal Circuit. I then worked at the law firms of White & Case LLP and Saul Ewing LLP before opening my own private practice. In 2019, I closed my practice to become a Trial Attorney at the Council on American Islamic Relations Legal Defense Fund, ultimately being promoted to Senior Litigation Attorney. Earlier this year, I joined CALDA. My primary area of practice since 2019 has been federal litigation challenging unconstitutional government laws and policies.

3. Starting at Saul Ewing LLP and continuing during my time in private practice,

I represented the Plaintiffs in the federal and state class actions both named *Cherry v. City of Baltimore*. The cases were federal and state law challenges to the City of Baltimore's pension reforms reducing the employment pensions of both active and retired police and firefighters who were employed by the City of Baltimore.

4. A true and correct copy of my CV is attached as Exhibit A. The CV includes a substantial (and incomplete) list of civil rights actions I have litigated.

I declare under the penalty of perjury that the forgoing is true and accurate, and that this declaration is executed in Arlington, VA on July 3, 2025.

/s/ Justin Sadowsky
Justin Sadowsky